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January 19, 2021

Via ECF

Honorable Alison J. Nathan, U.S.D.J.
United States District Court for the
Southern District of New York
40 Foley Square, Room 2102
New York, New York 10007

Re: *Jeffrey M. Goldman v. Sol Goldman Investments LLC, et al.*
Civil Action No.: 1:20-cv-6727

Dear Judge Nathan:

This firm represents Defendants Sol Goldman Investments LLC (“SGI”), Solil Management, LLC (“Solil”), and Jane H. Goldman (collectively, “Defendants”) in the above styled matter. Pursuant to Local Rule 7.1(d), SGI submits this letter-motion to adjourn the mediation presently scheduled for February 24, 2021, for the reasons set forth within.

As the Court is aware, SGI filed a motion to dismiss the Amended Complaint, pursuant to Rules 12(b)(1) (lack of subject matter jurisdiction) and 12(b)(6) (failure to state a claim upon which relief may be granted). That motion is not fully briefed yet. In the interim, pursuant to the Chief Judge’s standing order in employment cases, the mediation office assigned a mediator to this matter and an initial conference call between the parties and the mediator took place.

At the present time, a mediation session is scheduled for February 24, 2021. In light of the fact that SGI's motion is pending -- and raises subject-matter jurisdiction issues arising from a dispute as to which entity actually employed Plaintiff -- SGI respectfully requests that the mediation be adjourned until after the motion is decided. This would avoid the prospect of having an unnecessary and potentially improper party participate in the mediation, which only will disrupt the proceeding and reduce the chance of an amicable resolution. Once the Court decides the pending motion to dismiss, the parties can then proceed to mediation. No prior adjournment of the mediation session has been requested and counsel to Plaintiff has offered no objection to this request.

For the foregoing reasons, SGI respectfully submits that its letter-motion to adjourn the mediation presently scheduled for February 24, 2021 be granted.

Respectfully submitted,



Joshua S. Bauchner, Esq.
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Attorneys for Defendants

Cc: Counsel for Plaintiff (via ECF)

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